UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JAN 30 2003

4WD-RPB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Don Williams, Plant Environmental Coordinator
Grenada Manufacturing, LLC
635 Highway 332
Grenada, Mississippi 38901

SUBJ: Approval of Chrome Plating Line Closure Plan
Grenada Manufacturing, LLC
EPA ID No. MSD 007 037 278

Dear Mr. Williams;

The U.S. Environmental Protection Agency (EPA) has reviewed the Closure Plan for the Chrome Plating Line Area at the Grenada Manufacturing Plant in Grenada, Mississippi dated January 23, 2003. This was the second draft of the document: comments made by EPA on the first draft have been addressed, and EPA is hereby approving the final document.

As a result of a spike of total chromium in the groundwater above the MCL at MW-23 in April 2002, the facility re-developed MW-24 directly up gradient of MW-23 east of the Main Plant building; and sampled MW-23 and MW-24 for total chromium and hexavalent chromium once a month for three months to determine if the April 2002 spike may have been anomalous. Detected levels of total chromium in all three resampling events were lower than the MCL. Hexavalent chromium results were inconclusive due to matrix interferences, probably from high levels of chlorinated organics and toluene present in the samples.

Soil levels of hexavalent chromium range from below the Region 9 industrial PRG for hexavalent chromium of 64 mg/kg, to below the Region 3 industrial RBC for hexavalent chromium of 6,100 mg/kg. This, coupled with low groundwater chromium results from MW-23 directly down gradient of the former chrome plating lines support the conclusion that the soil chromium from the former chrome plating lines can be left in place.

However, there is another overriding concern that may prevent removal of the concrete pad and soil from inside the Main Plant Building at Grenada Manufacturing. MW-24 is contaminated with extremely high levels of Toluene, Trichlorethene, Vinyl Chloride, and cis 1-2 Dichloroethene. Recent analysis of purge water from Monitoring Well 24 resulted in levels of

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Toluene; 140,000 ug/l [MCL=1000 ug/l] Trichlorethene; 9,750 ug/l [MCL=5 ug/l] Vinyl Chloride; 3,180ug/l [MCL= 2ug/l] and cis 1-2 Dichloroethene; 19,300 ug/l [MCL=7ug/l]. Relative to the chromium levels seen under the former chrome line area, the chlorinated and volatile organics are a much greater problem.

There is already a concern regarding indoor air quality at the facility. An Indoor Air Vapor Assessment is under way at the facility. The final Indoor Air Monitoring Workplan has been approved and the first round of indoor air monitoring has been scheduled for February 2003. At this time, in EPA's view, it would not be wise to excavate for chromium in soil within the Main Plant building with high levels of chlorinated and volatile organics present. Therefore, EPA will approve a closure with waste in place of SWMU 27, the Former Chrome Plating Line Area. Floors should be sealed as airtight as possible and permanent monitoring of metals, chlorinated and volatile organics must be implemented. EPA will also require an approved Institutional Control of the Main Plant building to ensure that it remains in 'Industrial' land usage rather than 'Residential' land usage.

Remediation of the up gradient source areas for toluene and TCE contamination outside of the Main Plant building, known as AOCs A and B is being required under Grenada's interim measures and corrective measures workplans. Remediation of the down gradient toluene and TCE plume has been approved by EPA. And, because the down gradient remedy is a zero valence metal barrier, it will have the added benefit of chromium reduction.

If you have any questions or concerns regarding this letter, please contact Mr. Don Webster, your EPA Project Manager, at (404) 563-8469.

Sincerely,

Narindar M. Kumar,
Chief, RCRA Programs Branch
Waste Management Division

cc: Louis Crawford, MDEQ
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